

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re

HOTEL AIRPORT INC.

Debtor

CASE NO. 11-06620 ESL

Chapter 11

**MOTION SUBMITTING INFORMATION  
FOR STATUS CONFERENCE**

TO THE HONORABLE COURT:

COME NOW the above captioned debtors and respectfully submit the following information, requested for the Status Conference scheduled for 27 September 2011:

1. Debtors' business: Debtor is engaged in a hotel operation under the Best Western franchise in the LMM International Airport. Debtor is wholly owned by CARIBBEAN AIRPORT FACILITIES, INC ("CAF"), and is one of several entities controlled by the family composed of ANTHONY TIRRI, JEANNE TIRRI, JUSTIN TIRRI, and DAVID TIRRI, who are the stockholders of CAF.
2. Reason for filing: Cash flow shortage caused by decrease in business, and the landlord's refusal to allow for the use of multi-million credits held by CAF to offset rent payments. An eviction judgment was entered in favor of its landlord, the PR Ports Authority. Said cash shortage – and the underlying reason for the eviction action – will be solved by the reorganization intended herein, which will include a corporate merge with CARIBBEAN AIRPORT FACILITIES, INC.
3. Small Business Chapter 11 case: Debtor does not fall under the definition for small business due to the amount of its debts.
4. Timetable for DS and Plan: Debtor intends to file within its exclusivity period of 120 days (DIP intends to have its plan filed on or before November 30, 2011.)

**SUBMITTING INFORMATION FOR STATUS CONFERENCE**

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5. Estim. Fees: Professional Fees (Attorneys, Accountants, Auditors) estimated fees, absent (unexpected) litigation, \$75,000
6. Significant events: Postpetition use of cash collateral negotiated with FirstBank. A plan of reorganization, which will include a corporate merge with CARIBBEAN AIRPORT FACILITIES, INC . Said entity shall bring in the necessary financial strength for debtor's intended plan which is estimated to be a 100% payment plan, within a relatively short spread.
7. Future Status Conf.: None needed. Should the need arise, one will be requested.

In San Juan, Puerto Rico, dated: September 23, 2011.

I HEREBY CERTIFY that on this date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the participants appearing in said record, including the US Trustee.

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s/ **EDGARDO MUÑOZ**  
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